

INITIAL CONFERENCE QUESTIONNAIRE

1. Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page): 3/8/11

2. Deadline for first request for production of documents and first request for interrogatories (if later than the date of the initial conference, please explain why on a separate page): 3/8/11

2(a). Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for: plaintiff(s) 0; defendant(s) 0

3. Date for completion of any joinder of additional parties and amendment of the pleadings: 4/9/11

3(a). Number of proposed additional parties to be joined, if any, by: plaintiff(s) 1-2; defendant(s) 0

4. Number of depositions by plaintiff(s) of: parties 3-4; non-parties 2

5. Number of depositions by defendant(s) of: parties 2; non-parties 2

6. Date of status conference (joint status report due two business days in advance): _____

7. Date for completion of factual discovery: 7/8/11

8. Are expert witnesses needed? Yes No X

8(a). Number of expert witnesses, if any, of plaintiff(s): medical n/a; non-medical n/a

8(b). Date for completion of those expert reports: n/a

8(c). Number of expert witnesses, if any, of defendant(s): medical n/a; non-medical n/a

8(d). Date for completion of those expert reports: n/a

9. Date for completion of expert discovery: n/a

10. Date of pretrial conference (brief *ex parte* statements of settlement position due via fax two business days in advance): _____

11. Types of contemplated dispositive motions by plaintiff(s) and dates for filing of those motions: summary judgment
8/12/11

12. Types of contemplated dispositive motions by defendant(s) and dates for filing of those motions: summary judgment
8/12/11

13. Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.) Yes No X

14. Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.) Yes No n/a

15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (If any party declines to consent, answer no but do not indicate which party declined.) Yes No X